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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORLAND DIVISION

**TUCK WOODSTOCK; DOUG BROWN;  
SAM GEHRKE; MATHIEU LEWIS-  
ROLLAND; KAT MAHONEY; JOHN  
RUDOFF; and those similarly situated,**

Plaintiffs,

v.

**CITY OF PORTLAND**, a municipal corporation; and **JOHN DOES 1-60**, individual and supervisory officers of Portland Police Bureau and other agencies working in concert,

Defendants.

Case No. 3:20-cv-01035-SI

**SUPPLEMENTAL DECLARATION OF  
MATTHEW BORDEN IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
TEMPORARY RESTRAINING ORDER  
AND PRELIMINARY INJUNCTION**

I, Matthew Borden, declare:

1. I am an attorney at BraunHagey & Borden LLP, located in San Francisco, California. I am duly licensed to practice law before all courts in the State of California. I have applied to appear *pro hac vice* in this action as counsel of record for Plaintiffs. I base this declaration on facts within my personal knowledge and if called upon to testify, I could and would testify competently thereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of an email sent from Oregon House Speaker Tina Kotek to Mayor Wheeler on July 1, 2020, which is available at the following URL: [https://www.facebook.com/speakerkotek/posts/2248347975323164?\\_\\_tn\\_\\_=-R](https://www.facebook.com/speakerkotek/posts/2248347975323164?__tn__=-R).

I declare under penalty of perjury under the laws of United States of America that the foregoing is true and correct.

Dated: July 1, 2020



Matthew Borden